



February 23, 2012

Texas Commission on Environmental Quality  
Bridget C. Bohac  
Office of the Chief Clerk, MC-105  
P.O. Box 13087  
Austin, TX 78711-3087

Re: P&L Cast Stone  
Air Quality Standard Permit, Registration No. 93109

To Whom It May Concern:

Northwest ISD has previously objected to Mr. Rupp's cement plant application via on-line, US Mail and in person while attending several meetings with residents and TCEQ staff. If operation of this plant is approved, the plant will be located less than 440 yards of John M. Tidwell Middle School.

Although a report was made several times to TCEQ that the middle school will house up to 1,200 students a day during each school year and the attached TCEQ map clearly shows the location of the middle school well within the 440 yard zone; in all cases Northwest ISD comments and objections were taken and are on record but could not be considered since Northwest ISD is not a resident. Now, based on TCEQ Docket No. 2011-2114-Air, Northwest ISD understands under Texas Administrative Code Title 30, Part 1, Chapter 55, and Subchapter F Rule 55.203(b) Northwest ISD could be considered affected person(s) by the Commission, therefore;

Please reconsider some of the reasons presented to the TCQE previously in light of Mrs. Bohac's hearing. As a Public School District, a representative for the students that attend Tidwell Middle School, 99.5% of which are residents of the City of Fort Worth, and a State of Texas government entity, we ask the commission to reject Mr. Rupp's application based on possibilities of serious health hazard to the students of John Tidwell Middle School for years to come.


- Applicant plans to build a plant in a flood zone.
- The surrounding roads will not carry the heavy trucks traffic loads.
- Plant will recycle wastewater stored in a pond in a flood zone.
- Northwest ISD in conjunction with the City of Fort Worth constructed a new road with a culvert on Haslet - Roanoke road. This road was constructed for the opening of John M. Tidwell Middle School in the summer of 2010. The applicant stated in a meeting that he will enlarge the pond next to Haslet-Roanoke Road. Increasing the pond size will compromise the integrity of the culvert and void the maintenance agreement on it.
- Tidwell Middle School property line is within 440 yards of the plant site. There are concerns regarding the IAQ for the students and staff of Tidwell Middle School.

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- There is no plan in action to monitor the air quality before and after the permit issuance.
- To the best of my knowledge, no permit application has been filed with Tarrant County and the City of Fort Worth.
- The plant is manufactured as a temporary plant on wheels which the applicant has plans to use it as a permanent facility.

Please do not hesitate to contact me at 817-215-0055 or [maghili@nisdtx.org](mailto:maghili@nisdtx.org) should you have any questions.

Respectfully,

  
Mehran Aghili  
Northwest ISD, Support Services

CC:

Perry Rupp

Pamela Bach

Betsy Peticolas

Donald Nelson- TCEQ

Beecher Cameron- TCEQ

Brian Christian- TCEQ

Kyle Lucas- TCEQ

Sal Espino- City of Fort Worth

2012/02/24 12:16:38

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Northwest ISD Support Services

PO Box 77070

Fort Worth

Texas

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**FROM****TO**

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Sent: 2/24/12

at: 12:16:38 PM

4 page(s) (including cover)

Subject: File-ID [9414]

Comments:

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## FAX COVER SHEET

DATE:

2-24-12

PAGES TO FOLLOW:

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TO:

Bridget C. Bohac  
Office of the Chief Clerk, TCEQ

FAX NO.:

512-239-3311

FROM:

Mehran Aghali, NISD Support Services

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COMMENTS:

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